



EPA Region 7 TMDL Review

<i>TMDL ID</i>	289	<i>Water Body ID</i>	9000 (TMDL), 1211 (listed)
<i>Water Body Name</i>	Tributary to Barker Creek		
<i>Pollutant</i>	pH		
<i>Tributary</i>			
<i>State</i>	MO	<i>HUC</i>	10290108
<i>Basin</i>	Osage River		
<i>Submittal Date</i>	12/31/2003		
<i>Approved</i>	yes		

Submittal Letter

State submittal letter indicates final TMDL(s) for specific pollutant(s)/ water(s) were adopted by the state, and submitted to EPA for approval under section 303(d) of the Clean Water Act.

Submittal letter received on December 31, 2003, revision received January 21, 2004.

Water Quality Standards Attainment

The water body's loading capacity for the applicable pollutant is identified and the rationale for the method used to establish the cause-and-effect relationship between the numeric target and the identified pollutant sources is described. TMDL and associated allocations are set at levels adequate to result in attainment of applicable water quality standards.

MO WQS 10 CSR20-7.031 Section (4)(E) says water contaminants shall not cause pH to be outside of the range of 6.5-9.0 standard units. Beneficial usage of the creek are livestock and wildlife watering along with protection of warm water aquatic life and human health associated with fish consumption. Allocations are set for pH and alkalinity. The pH allocation attains the applicable water quality standards, however, since pH is not conservative, alkalinity is also allocated to assure attainment of applicable water quality standards.

Numeric Target(s)

Submittal describes applicable water quality standards, including beneficial uses, applicable numeric and/or narrative criteria. If the TMDL is based on a target other than a numeric water quality criterion, then a numeric expression, site specific if possible, was developed from a narrative criterion and a description of the process used to derive the target is included in the submittal.

pH water quality numeric criterion will be met and maintained. The secondary numeric target is net alkalinity (which is approximated by alkalinity) to prevent pH excursions outside the pH criterion caused by latent acidity. Net alkalinity is a conservative quantity (a conservative quantity does not change as the water flows downstream), whereas pH and alkalinity are not conservative quantities. Lack of data for net alkalinity makes it necessary to use alkalinity as the secondary numeric target. When the magnitude of alkalinity is large, alkalinity and net alkalinity are approximately equal, and alkalinity is a good approximation for net alkalinity.

Link Between Numeric Target(s) and Pollutant(s) of concern

An explanation and analytical basis for expressing the TMDL through surrogate measures (e.g., parameters such as percent fines and turbidity for sediment impairments, or chlorophyll-a and phosphorus loadings for excess algae) is provided, if applicable. For each identified pollutant, the submittal describes analytical basis for conclusions, allocations and margin of safety that do not exceed the load capacity.

pH criterion may not provide enough assurance that the proper pH range will be maintained due to possible latent acidity. Net alkalinity would be the preferred secondary water quality target, but the lack of sufficient acidity data makes this analysis difficult. Because of this, total alkalinity will be used as the secondary numeric water quality target. Alkalinity can be measured in Trib. Barker Creek and can be linked by correlation analysis to the pH numeric criterion using instream monitoring data. The secondary alkalinity numeric target assures that the load capacity for acidity (low pH) is not exceeded.

Source Analysis

Important assumptions made in developing the TMDL, such as assumed distribution of land use in the watershed, population characteristics, wildlife resources, and other relevant information affecting the characterization of the pollutant of concern and its allocation to sources, are described. Point, non point and background sources of pollutants of concern are described, including magnitude and location of the sources. Submittal demonstrates all significant sources have been considered.

The major contribution to pH is acid mine drainage which is a result of the oxidation of sulfide minerals in rocks in coal mining waste sites. The TMDL discusses all significant sources of acidity (low pH).

Allocation

Submittal identifies appropriate wasteload allocations for point, and load allocations for nonpoint sources. If no point sources are present the wasteload allocation is zero. If no nonpoint sources are present, the load allocation is zero.

The water body will have to meet in-stream water quality standards for pH (6.5-9.0 SU) and an alkalinity of 35 mg/L calcium carbonate or more. Neither the pH nor the alkalinity concentrations used as the numeric TMDL endpoints can be summed as LAs + WLAs +

MOS.

WLA Comment

There are no point source dischargers therefore the WLA is zero (expressed as mass of acid). Zero additional acid is equivalent to no induced change in pH.

LA Comment

Load capacity is concentration based; flows entering Trib. Barker Creek will be required to meet both the pH numeric criteria of 6.5 - 9.0 SU and the secondary target of 35 mg/L calcium carbonate. These allocations are concentrations, and meeting these concentrations restrictions, the numeric water quality criterion, pH (a measure of acid concentration), will be achieved.

Margin of Safety

Submittal describes explicit and/or implicit margin of safety for each pollutant. If the MOS is implicit, the conservative assumptions in the analysis for the MOS are described. If the MOS is explicit, the loadings set aside for the MOS are identified and a rationale for selecting the value for the MOS is provided.

The MOS is explicit and applied to the alkalinity numeric target. The regression of instream data for pH and alkalinity provides a "load capacity" of alkalinity of 22.7 mg/L calcium carbonate. The MOS was established at the 95% confidence level of the regression, which was 12.7 mg/L alkalinity (as calcium carbonate).

Seasonal Variation and Critical Conditions

Submittal describes the method for accounting for seasonal variation and critical conditions in the TMDL(s).

No seasonal variation; the primary processes involved in the formation of acid water and the oxidation of sulfide are not significantly impacted by differences in air and water temperatures associated with seasonal change.

Public Participation

Submittal describes public notice and public comment opportunity, and explains how the public comments were considered in the final TMDL(s).

Draft copy of report was placed on public notice from November 21, 2003, to December 21, 2003. Public comments were received and appropriate adjustments/edits were made in the final report. Six public meetings allowed input from the public, held between August 18 and September 22, 1999. No comments regarding this TMDL were received during the public meetings. This TMDL was described to the Henry County Soil Conservation District Board on April 7, 2002.

Monitoring Plan for TMDL(s) Under Phased Approach

The TMDL identifies the monitoring plan that describes the additional data to be collected to determine if the load reductions required by the TMDL lead to attainment of WQS, and a schedule for considering revisions to the TMDL(s) (where phased approach is used).

Since this is a phased TMDL, MDNR will continue to monitor this stream twice annually. A survey to assess macroinvertebrate diversity is planned.

Reasonable assurance

Reasonable assurance only applies when reduction in nonpoint source loading is required to meet the prescribed waste load allocations.

Not required.



EPA Region 7 TMDL Review

TMDL ID	290	Water Body ID	1211 (listed), 9000(TMDL)
Water Body Name	Tributary to Barker Creek		
Pollutant	sulfate		
Tributary			
State	MO	HUC	10290108
Basin	Osage River		
Submittal Date	12/31/2003		
Approved	yes		

Submittal Letter

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Submittal letter received on December 31, 2003, revision received January 21, 2004.

Water Quality Standards Attainment

The water body's loading capacity for the applicable pollutant is identified and the rationale for the method used to establish the cause-and-effect relationship between the numeric target and the identified pollutant sources is described. TMDL and associated allocations are set at levels adequate to result in attainment of applicable water quality standards.

The WQS for sulfate in this TMDL is part of a combined sulfate plus chloride numeric criterion of 1000 mg/L. This water body is listed only for sulfate. This TMDL establishes allocations for the combined criterion, so that bundled with this sulfate TMDL is implicitly a Section 303(d)(3) TMDL for chloride. By establishing an allocation for the combined criterion, the level of sulfate will be adequate to attain the numeric water quality criterion.

Numeric Target(s)

Submittal describes applicable water quality standards, including beneficial uses, applicable numeric and/or narrative criteria. If the TMDL is based on a target other than a numeric water quality criterion, then a numeric expression, site specific if possible, was developed from a narrative criterion and a description of the process used to derive the target is included in the submittal.

The target is based on the numeric water quality criterion. In this case, the numeric criterion is for sulfate plus chloride concentration. The chloride levels are not influenced by loadings received from the abandoned coal mine lands. Thus, this TMDL establishes loadings for sulfate, which comes from the abandoned coal mine lands.

Link Between Numeric Target(s) and Pollutant(s) of concern

An explanation and analytical basis for expressing the TMDL through surrogate measures (e.g., parameters such as percent fines and turbidity for sediment impairments, or chlorophyll-a and phosphorus loadings for excess algae) is provided, if applicable. For each identified pollutant, the submittal describes analytical basis for conclusions, allocations and margin of safety that do not exceed the load capacity.

The link between the numeric target and the sulfate pollutant is direct, and expressed in concentration units.

Source Analysis

Important assumptions made in developing the TMDL, such as assumed distribution of land use in the watershed, population characteristics, wildlife resources, and other relevant information affecting the characterization of the pollutant of concern and its allocation to sources, are described. Point, non point and background sources of pollutants of concern are described, including magnitude and location of the sources. Submittal demonstrates all significant sources have been considered.

The source of excessive sulfate is water from abandoned coal mine lands. There are no point sources and background levels of sulfate are insignificant. All significant sources of sulfate have been considered.

Allocation

Submittal identifies appropriate wasteload allocations for point, and load allocations for nonpoint sources. If no point sources are present the wasteload allocation is zero. If no nonpoint sources are present, the load allocation is zero.

The allocations are in units of concentration, and can not be summed as $LA + WLA + MOS = TMDL$. The allocations are established for the sum of two substances, sulfate plus chloride, as given in the Missouri WQ standards.

WLA Comment

The WLA for sulfate is established as zero.

LA Comment

The LA for sulfate is established as 970 mg/L of sulfate plus chloride.

Margin of Safety

Submittal describes explicit and/or implicit margin of safety for each pollutant. If the MOS is implicit, the conservative assumptions in the analysis for the MOS are described. If the MOS is explicit, the loadings set aside for the MOS are identified and a rationale for selecting the value for the MOS is provided.

The margin of safety is explicit, and selected as 3% of the loading capacity. The chloride levels were considered in this margin of safety. The margin of safety was based on the precision of the measurements of chloride and sulfate.

Seasonal Variation and Critical Conditions

Submittal describes the method for accounting for seasonal variation and critical conditions in the TMDL(s).

The allocations are for all seasons, because the processes that cause the excessive levels of sulfate are not significantly affected by the seasons.

Public Participation

Submittal describes public notice and public comment opportunity, and explains how the public comments were considered in the final TMDL(s).

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The TMDL identifies the monitoring plan that describes the additional data to be collected to determine if the load reductions required by the TMDL lead to attainment of WQS, and a schedule for considering revisions to the TMDL(s) (where phased approach is used).

Since this is a phased TMDL, MDNR will continue to monitor this stream twice annually. A survey to assess macroinvertebrate diversity is planned.

Reasonable assurance

Reasonable assurance only applies when reduction in nonpoint source loading is required to meet the prescribed waste load allocations.

Not required.
